

1 McCormick, Barstow, Sheppard,  
 Wayte & Carruth LLP  
 2 Jonathan W. Carlson  
 Nevada Bar No. 10536  
 3 *jonathan.carlson@mccormickbarstow.com*  
 Cheryl A. Grames  
 4 Nevada Bar No. 12752  
*cheryl.grames@mccormickbarstow.com*  
 5 7160 Rafael Rivera Way, Suite 320  
 Las Vegas, Nevada 89113  
 6 Telephone: (702) 949-1100  
 Facsimile: (702) 949-1101

7 Attorneys for GEICO CASUALTY COMPANY  
 8

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11  
 12 NICOLLE JONES PARKER, an individual,

13 Plaintiff,

14 v.

15 GEICO CASUALTY COMPANY, an entity  
 licensed to do business in Nevada; DOES I-X,  
 16 and ROES XI-XX,

17 Defendants.

18 Case No. 2:24-cv-02396-CDS-MDC

**STIPULATION AND ORDER TO  
 EXTEND DEADLINE TO FILE  
 RESPONSE TO FIRST AMENDED  
 COMPLAINT**

**First Request**

19 Plaintiff NICOLLE JONES PARKER (“Plaintiff”), by and through her attorneys of record,  
 20 and Defendant GEICO CASUALTY COMPANY (“GEICO”), by and through its attorneys of  
 record, hereby file this Stipulation and Order to extend the deadline for GEICO to file its responsive  
 21 pleading to the First Amended Complaint (ECF No. 27, filed on Aug. 27, 2025). The current  
 22 deadline for filing the responsive pleading is Sep. 10, 2025. The parties seek a thirty-day (30)  
 23 extension of that deadline to October 10, 2025.  
 24

25 The parties have good cause to seek an extension of the current deadline for responding to  
 26 the First Amended Complaint. Specifically, as indicated by the March 21, 2025 Notice of  
 27 Bankruptcy (ECF No. 20), Plaintiff initiated a bankruptcy action. In the course of the bankruptcy  
 28 proceedings, the U.S. Bankruptcy Trustee has authorized resolution of Plaintiff’s suit against

1 GEICO. Counsel have met and had subsequent, multiple communications regarding resolution; their  
2 most recent teleconference occurred today. Due to the complexities presented by the bankruptcy  
3 proceedings and the need for the U.S. Bankruptcy Trustee's approval of the settlement, the parties  
4 sought and received an extension of that deadline to avoid unnecessary litigation costs being  
5 incurred that would affect the debtor's (now the U.S. Trustee's) estate. (ECF Nos. 25 and 26).

6 Out of an abundance of caution, Plaintiff filed an amended complaint pursuant to the Court's  
7 order granting GEICO's Motion to Dismiss the extra-contractual claims to preserve Mrs. Parker's  
8 (and the Trustee's) rights. (*See* ECF No. 24, dated Aug. 12, 2025). The undersigned spoke again  
9 yesterday about their progress in moving toward resolution, and the need for the Trustee's approval  
10 of a tentative agreement. As such, the parties and their counsel submit that good cause exists for this  
11 brief extension of the responsive pleading deadline.

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1 THEREFORE IT IS HEREBY STIPULATED AND AGREED between the parties to  
2 extend the deadline for GEICO to file its responsive pleading to the First Amended Complaint from  
3 Sep. 10, 2025 to October 10, 2025, thereby allowing for settlement discussions with the U.S.  
4 Bankruptcy Trustee to continue.

5 DATED August 28, 2025.

6 McCORMICK, BARSTOW, SHEPPARD,  
7 WAYTE & CARRUTH LLP

8 By /s/ Cheryl A. Grames  
9 Jonathan W. Carlson  
10 Nevada Bar No. 10536  
11 Cheryl A. Grames  
12 Nevada Bar No. 12752  
13 7160 Rafael Rivera Way, Suite 320  
14 Las Vegas, Nevada 89113  
15 Tel. (702) 949-1100  
16 *Attorneys for GEICO Casualty Company*

17 DATED August 28, 2025.

18 LBC LAW GROUP

19 By: /s/John C. Courtney  
20 John C. Courtney  
21 Nevada Bar No. 11092  
22 Andrew P. Dunning  
23 Nevada Bar No. 13864  
24 723 South 7th Street  
25 Las Vegas, Nevada 89101  
26 *Attorneys for Plaintiff*

27 **IT IS SO ORDERED.**

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